

The State of Ohio,
Franklin County

} SS.

INDICTMENT FOR: Unlawful Securities Practices (ORC 1707.44) (F3) (7 Counts); Unlawful Securities Practices (ORC 1707.44) (F3) (2 Counts); Unlawful Securities Practices (ORC 1707.44) (F3) (2 Counts); Unlawful Securities Practices (ORC 1707.44) (F1) (2 Counts); Grand Theft (ORC 2913.02) (F4) (1 Count); Unlawful Securities Practices (ORC 1707.44) (F2) (1 Count); Unlawful Securities Practices (ORC 1707.44) (F2) (1 Count); Grand Theft (ORC 2913.02) (F4) (1 Count); Unlawful Securities Practices (ORC 1707.44) (F2) (1 Count); Theft From a Person in a Protected Class (ORC 2913.02) (F3) (1 Count). Total: 19 Counts.

Grand Jury Term
Beginning September 14, 2018

Count One Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Two Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2015 to December 31, 2015

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2015 to December 31, 2015, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Three Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Four Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Five Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about June 26, 2015

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about June 26, 2015, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Six Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about June 26, 2015 to December 10, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about June 26, 2015 to December 10, 2018, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited, to wit: used IRA funds for personal expenses. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Seven Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Eight Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Nine Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Ten Unlawful Securities Practices, §1707.44, F1

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Count Eleven Unlawful Securities Practices, §1707.44, F1

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is one hundred fifty thousand dollars or more.

Count Twelve Grand Theft, §2913.02, F4

Defendants Jeffery Luke Westerman

Date of Offense On or about November 18, 2013 to December 31, 2013

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 18, 2013 to December 31, 2013, within the County of Franklin aforesaid, in violation of section 2913.02 of the Ohio Revised Code, did with purpose to deprive the owner, Rocky Moody, of property or services, to wit: cash, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more and less than one hundred fifty thousand dollars.

Count Thirteen Unlawful Securities Practices, §1707.44, F2

Defendants Jeffery Luke Westerman

Date of Offense On or about February 24, 2016 to August 31, 2017

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about February 24, 2016 to August 31, 2017, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Count Fourteen Unlawful Securities Practices, §1707.44, F2

Defendants Jeffery Luke Westerman

Date of Offense On or about February 24, 2016 to August 31, 2017

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about February 24, 2016 to August 31, 2017, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited, to wit: used IRA funds for personal expenses. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Count Fifteen Grand Theft, §2913.02, F4

Defendants Jeffery Luke Westerman

Date of Offense On or about February 24, 2016 to August 31, 2017

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about February 24, 2016 to August 31, 2017, within the County of Franklin aforesaid, in violation of section 2913.02 of the Ohio Revised Code, did with purpose to deprive the owner, Rodney Moody, of property or services, to wit: cash, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent. Furthermore, the property or services stolen is valued at seven thousand five hundred dollars or more.

Count Sixteen Unlawful Securities Practices, §1707.44, F2

Defendants Jeffery Luke Westerman

Date of Offense On or about January 1, 2014 to December 31, 2014

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about January 1, 2014 to December 31, 2014, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, with purpose to deceive, did make, record, or publish or cause to be made, recorded, or published, a report of a transaction in securities which was false in any material respect. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is thirty-seven thousand five hundred dollars or more but less than one hundred fifty thousand dollars.

Count Unlawful Securities Practices, §1707.44, F3
Seventeen

Defendants Jeffery Luke Westerman

Date of Offense On or about November 7, 2016

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 7, 2016, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did knowingly make or cause to be made a false representation concerning a material and relevant fact, in any oral statement or in any prospectus, circular, description, application, or written statement, for the purpose of selling any securities in this state. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Eighteen Unlawful Securities Practices, §1707.44, F3

Defendants Jeffery Luke Westerman

Date of Offense On or about November 7, 2016 to December 10, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 7, 2016 to December 10, 2018, within the County of Franklin aforesaid, in violation of section 1707.44 of the Ohio Revised Code, did, in purchasing or selling securities, knowingly engage in any act or practice that was, in Chapter 1707, declared illegal, defined as fraudulent, or prohibited, to wit: used investment funds for personal expenses. Furthermore, the value of the funds or securities involved in the offense or the loss to the victim is seven thousand five hundred dollars or more but less than thirty-seven thousand five hundred dollars.

Count Nineteen Theft From a Person in a Protected Class, §2913.02, F3

Defendants Jeffery Luke Westerman

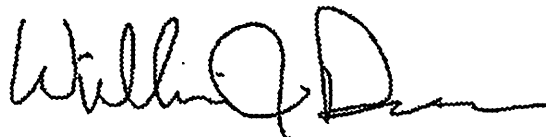
Date of Offense On or about November 7, 2016 to December 10, 2018

The Jurors of the Grand Jury of the State of Ohio, duly selected, impaneled, sworn and charged to inquire of crimes and offenses committed within the body of Franklin County, in the State of Ohio, upon their oath do find and present that Jeffery Luke Westerman late of said County, on or about November 7, 2016 to December 10, 2018, within the County of Franklin aforesaid, in violation of section 2913.02 of the Ohio Revised Code, did with purpose to deprive the owner, Lawrence Lubbers, of property or services, to wit: cash, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent. Furthermore, the victim of the offense is an elderly person, disabled adult, active duty service member, or spouse of an active duty service member and the property or services stolen is valued at seven thousand five hundred dollars or more.

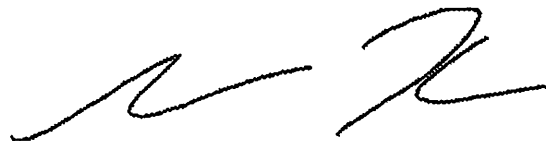
All of the above conduct being contrary to the form of the statute in such cases made and provided,
and against the peace and dignity of the State of Ohio.

A TRUE BILL

Ron O'Brien
Prosecuting Attorney
Franklin County, Ohio



William J. Davies, 0071072
Assistant Prosecuting Attorney



Foreperson, Grand Jury